

1 THE HONORABLE RICARDO S. MARTINEZ  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

10 BARBARA CAMPBELL, an individual,

11 Plaintiff,

12 v.

13 DELL TECHNOLOGIES, INC., a Delaware  
14 corporation; CHAD BOPE, an individual; and  
15 TODD LIEB, an individual;

16 Defendants.

10 Case No. 2:24-cv-00711-RSM

11 **STIPULATION AND ORDER FOR A  
12 PARTIAL STAY OF PROCEEDINGS**

18 **STIPULATION**

19 Defendant DELL TECHNOLOGIES, INC., and Plaintiff BARBARA CAMPBELL,  
20 hereby STIPULATE AND AGREE to request that the Court stay discovery and the deadlines for  
21 a FRCP 26(f) conference, initial disclosures, and joint status report, and all deadlines included in  
22 the Court's Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Dkt.  
23 13) until one month after the Court issues a decision on Defendant's Motion to Dismiss, filed May  
24 29, 2024 (Dkt. 6), and the pleadings are closed. The stipulated stay of discovery and related  
25 deadlines would promote efficiency for the parties and the Court. This stipulation and order shall

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STIPULATION AND ORDER  
TO STAY PROCEEDINGS  
(Case No.: 2:24-cv-00711-RSM) – 1

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1 not operate as an admission of any factual allegation or legal conclusion, nor shall it operate as a  
2 waiver nor otherwise affect any right, defense, claim or objection.

3 *IT IS SO STIPULATED.*

4 DATED this 31st day of July, 2024.

5 **HKM EMPLOYMENT ATTORNEYS LLP MORGAN, LEWIS & BOCKIUS LLP**

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15 *Attorneys for Defendant Dell Technologies, Inc.*

## **ORDER**

IT IS SO ORDERED. The Court HEREBY STAYS discovery and the deadlines for a 26(f) conference, initial disclosures, and joint status report until after the Court rules on Defendant's Motion to Dismiss.

DATED this 6<sup>th</sup> day of August, 2024.

  
Ricardo S. Martinez  
United States District Judge

*Presented by:*

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**STIPULATION AND ORDER  
TO STAY PROCEEDINGS  
(Case No.: 2:24-cv-00711-RSM) – 3**

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